

# **Exhibit A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

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AUSTIN ONUSZ, CEDRIC KEES VAN  
PUTTEN, NICHOLAS J. MARSHALL and  
HAMAD DAR, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

WEST REALM SHIRES INC., WEST REALM  
SHIRES SERVICES INC. (D/B/A FTX US),  
FTX TRADING LTD., ALAMEDA  
RESEARCH LLC, SAM BANKMAN-FRIED,  
ZIXIAO WANG, NISHAD SINGH and  
CAROLINE ELLISON,

Defendants.

Adv. Pro. No. 22-50513 (JTD)

**Ref. Nos. 1, 23, 30 & 37**

**FOURTH STIPULATION REGARDING EXTENSION  
OF THE RESPONSE DEADLINE**

This *Fourth Stipulation Regarding Extension of the Response Deadline* (the “Stipulation”) is made as of June 15, 2023, by and among Austin Onusz, Cedric Kees van Putten, Nicholas J. Marshall, and Hamad Dar (collectively, the “Plaintiffs”) and West Realm Shires Inc., West Realm Shires Services Inc. (d/b/a FTX US), FTX Trading Ltd., Alameda Research LLC (collectively, the “Debtor Defendants” and together with the Plaintiffs, the “Parties”).

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

**RECITALS**

**WHEREAS**, on December 27, 2022, Plaintiffs filed the *Adversary Complaint for Declaratory Judgment and Violations of Common Law* (the “Complaint”) [Adv. D.I. 1] in the above-captioned adversary proceeding against, among others, the Debtor Defendants.

**WHEREAS**, on January 5, 2023, Plaintiffs served the Complaint on the Debtor Defendants.

**WHEREAS**, on February 3, 2023, the Court entered the *Order Approving Stipulation Regarding Extension of the Response Deadline* [Adv. D.I. 23], extending the Debtor Defendants’ deadline to answer, move or otherwise respond to the Complaint to April 7, 2023.

**WHEREAS**, pursuant to rule 7004-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, Plaintiffs noticed the pretrial conference (the “Pretrial Conference”) for April 12, 2023 at 1:00 p.m. (ET).

**WHEREAS**, on April 10, 2023, the Court entered the *Order Approving Second Stipulation Regarding Extension of the Response Deadline* [Adv. D.I. 30], further extending the Debtor Defendants’ deadline to answer, move or otherwise respond to the Complaint to April 27, 2023 and adjourning the date of the Pretrial Conference to May 17, 2023.

**WHEREAS**, on April 28, 2023, the Court entered the *Order Approving Third Stipulation Regarding Extension of the Response Deadline* [Adv. D.I. 37], further extending the Debtor Defendants’ deadline to answer, move or otherwise respond to the Complaint to June 15, 2023 (the “Response Deadline”) and adjourning the date of the Pretrial Conference to June 28, 2023.

**WHEREAS**, the Parties have agreed, as set forth herein, that the Debtor Defendants’ Response Deadline shall be further extended to July 31, 2023 and the date of the Pretrial Conference shall be adjourned to a date to be determined.

**NOW, THEREFORE**, in consideration of the foregoing recitals and the mutual

promises hereinafter contained, the Parties, intending to be legally bound, hereby stipulate and agree as follows:

**STIPULATION**

1. The Parties agree that notwithstanding anything to the contrary in the Bankruptcy Rules, the Debtor Defendants' Response Deadline is hereby extended to July 31, 2023, which may be further extended by agreement of the Parties or order of the Court.

2. The Pretrial Conference is hereby adjourned to a date to be determined.

3. This Stipulation constitutes the entire agreement and understanding between the Parties with respect to the subject matter hereof. The terms of this Stipulation may not be changed, amended, modified, or altered except by written agreement signed by each of the Parties or confirming emails exchanged by counsel to the Parties.

4. The Parties, by and through their undersigned counsel, each represent and warrant that the undersigned is fully authorized and empowered to execute and deliver this Stipulation on behalf of, and to bind, each Party, as applicable, to the terms and conditions of this Stipulation.

5. The Parties have cooperated in the drafting and preparation of this Stipulation. Therefore, in any construction to be made of this Stipulation, the Stipulation shall not be construed for or against any Party on that basis.

6. This Stipulation shall be governed by and construed in accordance with the United States Bankruptcy Code and, where not inconsistent, the laws of the State of Delaware, without regard to the conflict of laws principles thereof.

7. This Stipulation may be executed in any number of counterparts, and each such counterpart is to be deemed an original for all purposes, but all counterparts shall collectively constitute one agreement. Further, electronic signatures or transmissions of an originally signed

document by facsimile or electronic mail shall be as fully binding on the Parties as an original document.

8. The Bankruptcy Court shall have and retain jurisdiction to resolve any disputes or controversies arising from, in connection with, or related to this Stipulation.

9. Notwithstanding the possible application of any Bankruptcy Rule to the contrary, the Order approving this Stipulation shall be in full force and effect upon its entry.

Dated: June 15, 2023

**LANDIS RATH & COBB LLP**

/s/ Matthew B. McGuire

Adam G. Landis (No. 3407)  
Matthew B. McGuire (No. 4366)  
Kimberly A. Brown (No. 5138)  
Matthew R. Pierce (No. 5946)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
E-mail: landis@lrclaw.com  
brown@lrclaw.com  
pierce@lrclaw.com

-and-

**SULLIVAN & CROMWELL LLP**

Andrew G. Dietderich (admitted *pro hac vice*)  
James L. Bromley (admitted *pro hac vice*)  
Brian D. Glueckstein (admitted *pro hac vice*)  
Alexa J. Kranzley (admitted *pro hac vice*)  
125 Broad Street  
New York, NY 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
E-mail: dietdericha@sullcrom.com  
bromleyj@sullcrom.com  
gluecksteinb@sullcrom.com  
kranzleya@sullcrom.com

*Counsel for the Debtors  
and Debtors-in-Possession*

**CHIMICLES SCHWARTZ KRINER &  
DONALDSON-SMITH LLP**

/s/ Scott M. Tucker

Robert J. Kriner, Jr. (Del. Bar. No. #2546)  
Scott M. Tucker (Del. Bar. No. #4925)  
2711 Centerville Rd, Suite 201  
Wilmington, Delaware 19808  
Telephone: (302) 656-2500  
E-mail: robertkriner@chimicles.com  
scotttucker@chimicles.com

**ENTWISTLE & CAPPUCCI LLP**

Andrew J. Entwistle  
500 W. 2nd Street, Suite 1900  
Austin, Texas 78701  
Telephone: (512) 710-5960  
E-mail: aentwistle@entwistle-law.com

-and-

Robert N. Cappucci  
Joshua K. Porter  
230 Park Avenue, 3rd Floor  
New York, NY 10169  
Telephone: (212) 894-7200  
E-mail: rcappucci@entwistle-law.com  
jporter@entwistle-law.com

*Counsel For Plaintiffs Austin Onusz, Cedric  
Kees van Putten, Nicholas J. Marshall and  
Hamad Dar*